

# **BRENNEKE DECLARATION**

## **EXHIBIT A**

**From:** [Chien, Marsha \(ATG\)](#)  
**To:** [shannon.armstrong@hklaw.com](mailto:shannon.armstrong@hklaw.com)  
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**Subject:** Washington v. NWDC - Missing Docs  
**Date:** Wednesday, June 05, 2019 8:58:53 AM  
**Attachments:** [Scan-06042019032108.pdf](#)

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Shannon,

I am writing to express concern that GEO's response to the State's discovery requests is not complete. We recently received the attached document, which appears to be part of GEO's request to ICE for an equitable adjustment. It was obtained from ICE in response to a FOIA request.

The document is squarely responsive to RFP No. 12, which requested all communications about the VWP with ICE. As such, we request that GEO provide the complete, unredacted document as well as any related communications with ICE. If any privileges apply, please specify them.

Kind Regards,

Marsha

**Marsha Chien**

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